



October 12, 2012

Mr. Earl K. Rush
President/CEO/CFO
Louisiana Culinary Institute
10550 Airline Highway
Baton Rouge, LA 70816-4109

Certified Mail
Return Receipt Requested
No: 7011 2000 0000 8054 3106

RE: **Final Program Review Determination**
OPE ID: 04112300
PRCN: 201230627945

Dear Mr. Rush:

The U.S. Department of Education's (Department's) Dallas School Participation Division issued a program review report on August 8, 2012 covering Louisiana Culinary Institute's (LCI's) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2010-11 and 2012-12 award years. The institution's final response was received on September 10, 2012.

The Dallas School Participation Division has reviewed LCI's response to the Program Review Report. A copy of the program review report (and related attachments) and LCI's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by LCI upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

LCI's response has resolved all findings. In addition LCI has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, LCI may consider the program review closed with no further action required.

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s), claim(s) or expenditure(s) questioned in the program review [34 C.F.R. § 668.24(e)(3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].

Federal Student Aid

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

1999 Bryan Street, Suite 1410, Dallas, TX 75201-6817

If you have any questions please call Bruce Anderson at (214) 661-9470.

Sincerely,

(b)(6)

Cynthia Thornton, Director
Dallas School Participation Division

Enclosure: Program Review Report (with attachments)
LCI's Response to the Program Review Report

cc: April Ruffalo, Compliance Officer
Louisiana State Board of Regents
Council on Occupational Education



August 8, 2012

Mr. Earl K. Rush
President/CEO/CFO
Louisiana Culinary Institute
10550 Airline Highway
Baton Rouge, LA 70816-4109

Certified Mail
Return Receipt Requested
No: 7011 2000 0000 8054 3045

RE: Program Review Report
OPE ID: 04112300
PRCN: 201230627945

Dear Mr. Rush:

From June 11, 2012 through June 14, 2012, Bruce Anderson and MaEsther Francis conducted a review of Louisiana Culinary Institute's (LCI's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by LCI. The response should include a brief, written narrative for each finding that clearly states LCI's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, LCI must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
 - a. A written statement addressing the institution's response;
 - b. A written statement of the basis for such report or determination; and
 - c. A copy of the institution's response.

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

Federal Student Aid, Dallas School Participation Division
1999 Bryan Street, Suite 1410
Dallas, TX 75201
www.FederalStudentAid.ed.gov

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for inspection by LCI upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Bruce Anderson of this office within 30 calendar days of receipt of this letter.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. This appendix was provided to the institution while the reviewers were on site. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Bruce Anderson at (214) 661-9470 or bruce.anderson@ed.gov.

Sincerely,

(b)(6)

Jesus Moya
Compliance Manager

cc: April Ruffalo, Compliance Officer

Enclosure:
Protection of Personally Identifiable Information

Prepared for
Louisiana Culinary Institute



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID 04112300
PRCN 201230627945

Prepared by
U.S. Department of Education
Federal Student Aid
Dallas School Participation Division

Program Review Report

August 8, 2012

Dallas School Participation Division
1999 Bryan Street, Suite 1410
Dallas, Texas 75201-6817
www.FederalStudentAid.ed.gov
1-800-4-FED-AID

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A. Institutional Information

Louisiana Culinary Institute
10550 Airline Highway
Baton Rouge, LA 70816-4109

Type: Proprietary

Highest Level of Offering: Associate's Degree

Accrediting Agency: Council on Occupational Education

Current Student Enrollment: 126 (2011-2012)

% of Students Receiving Title IV: 92% (2011-2012)

Title IV Participation: School Participation Team Funding Report

	<u>2010-2011</u>
Federal Pell Grant (Pell)	\$ 381,105
William D. Ford Federal Direct Loan (Direct Loan)	\$ 1,452,890

Default Rate FFEL/DL:	2009	9.5 %
	2008	15.0%
	2007	0%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Louisiana Culinary Institute (LCI) from June 11, 2012 to June 14, 2012. The review was conducted by Mr. Bruce Anderson and Ms. MaEsther Francis.

The focus of the review was to determine LCI's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of LCI's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2010-2011 and 2011-2012 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning LCI's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve LCI of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by LCI to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Campus Security Procedures Inadequate

Citation: Institutions are required to publish and distribute, by October 1 of each year, an annual security report that contains required crime statistics, as well as required statements and policies, to its current students and employees. Institutions must also inform prospective students and employees of the report's availability and provide a copy upon request.

The annual security report must report crime statistics for the three most recent calendar years concerning the occurrence on campus, in or on non-campus buildings or property, and on public property of the following offenses:

- Criminal homicide (murder and non-negligent manslaughter, and negligent manslaughter)
- Sex offenses (forcible sex offenses and non-forcible sex offenses)
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Arson
- Arrests for liquor law violations, drug law violations, and illegal weapons possession
- Persons not included in the above category who were referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession

An institution must report, by category of prejudice, the following crimes reported to local police agencies or to a campus security authority that manifest evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability, any crime it reports in the categories above, and the crimes of larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property and, any other crime involving bodily injury.

The annual security report must also contain a number of statements, including, a statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses, and procedures to follow when a sex offense occurs. The statement must include:

- A description of educational programs to promote the awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses;

- Notification to students that the institution will change a victim's academic and living situations after an alleged sex offense and of the options of those changes, if those changes are requested by the victim and are reasonably available;
- Procedures for campus disciplinary action in cases of an alleged sex offense, including a clear statement that both the accused and the accuser are entitled to the same opportunities to have others present during a disciplinary hearing and both must be informed of the outcome of any disciplinary proceeding brought alleging a sex offense; and
- Sanctions the institution may impose following the final determination of a disciplinary action regarding any forcible or non-forcible sex offense.

34 C.F.R. § 668.46

Noncompliance: Crime statistics provided in the annual security report to students and staff does include all of the required crime categories. Specifically, LCI only includes the following crime categories in the annual security report distributed to students and staff:

- Murder
- Sexual Assault
- Assault
- Motor Vehicle Theft Arson
- Hate Crimes

Additionally, the sexual assault information available to students was insufficient. LCI did not include any information regarding the required sexual assault educational programs, including the required notifications and sanctions.

Required Action: LCI must revise its annual security report to include all the required crime categories and provide a copy to all current students and employees. This report must contain all required statements, including the sexual assault information, as specified in 34 C.F.R. § 668.46.

The Department has made available the "*Handbook for Campus Safety and Security Reporting*" to assist institutions in complying with the Clery Act. It can be found at the following web address:

<http://www2.ed.gov/admins/lead/safety/campus.html>

LCI may elect to distribute the report to its current students and employees via the web but, to do this, must provide an individual notice to each recipient that includes:

- A statement of the report's availability,
- A list and brief description of the information contained in the report,

- The exact electronic address of the Internet or Intranet Web site at which the report is posted, and
- A statement saying the school will provide a paper copy upon request.

Finding 2: Use of Current Year Aid to Pay Prior Year Charges

Citation: When crediting a student's account at the institution, Title IV, HEA program funds may be used to credit a student's account at the institution to satisfy:

(1) Current year charges for-

- Tuition and fees;
- Board, if the student contracts with the institution for board;
- Room, if the student contracts with the institution for room; and
- Other educationally related charges incurred by the student at the institution, if the institution obtains the student's or parent are authorization.

(2) Prior award year charges for a total of not more than \$200 for-

- Tuition and fees, room, or board; and
- Other educationally related charges incurred by the student at the institution, if the institution obtains the student's or parent are authorization.

34 C.F.R. §§ 668.164(d) and 668.165(b)

Noncompliance: LCI used funds disbursed to students from the 2011-2012 award year to pay prior year charges in excess of \$200.00.

The account for student #23 had an ending balance of \$1631.00 on 09/14/2011 for the 2010-2011 award year. Beginning with the 2011-2012 award year, tuition for \$7000.00 was charged on 12/05/2012, \$7974 in Title IV aid was disbursed on 12/06/2011, and \$317.00 of non-Title IV was applied on the student's account on 12/14/2011. Title IV aid of \$457.00 from award year 2011-2012 was applied to 2010-2011 prior year charges that was in excess of the \$200.00 allowed.

Required Action: LCI is required to develop and submit to this office a procedure that will ensure the Department that this issue will not recur in any future audit or program review.

Finding 3: Credit Balance Deficiencies

Citation: An institution is required to disburse credit balances created as a result of Title IV funding disbursements within 14 calendar days after the balance occurs, unless the institution has written authorization from the student to hold the funds on the account. Notwithstanding this authorization, the institution must pay any remaining balance on loan funds by the end of the

loan period and any remaining other Title IV, HEA program funds by the end of the last payment period in the award year in which they are awarded. *34 C.F.R. §§ 668.164(e) and 668.165(b)*

Noncompliance: LCI failed to pay credit balances within the required timeframe for one student in the 2010-11 award year and for one student in the 2011-12 award year.

Student #13 –Federal Direct Loans were credited to the student account on 12/20/2010, resulting in an overall credit balance of \$2,576. On the same day, a refund was processed to the student for \$1,292.50, leaving a credit balance on the account totaling \$1,283.50. This credit balance was held on the account until 4/11/11, when the subsequent semester's tuition was credited to the account. However, since there was no credit balance authorization for the student, the credit balance should have been disbursed to the student within 14 days of the creation of the balance.

Student #25 –Federal Direct Loans were credited to the student account on 5/12/2012, resulting in an overall credit balance of \$1,221. As of 6/11/2012, no refund has been processed for the student. Since there was no credit balance authorization for the student, the credit balance should have been disbursed to the student within 14 days of the creation of the balance.

Required Action: The account summary for student #13 showed that all credit balance funds were subsequently received by the student. However, for student #25 LCI must submit documentation that the credit balance funds were paid to the student or provide an appropriate credit balance authorization allowing the institution to hold funds for subsequent payment periods within the loan period. In addition, LCI must develop a procedure to ensure that credit balances payments are paid timely and submit it to this office.

Finding 4: Improper Loan Certification

Citation: Need is defined as the cost of attendance (COA) minus the student's expected family contribution (EFC) minus estimated financial assistance and other resources. Estimated financial assistance (EFA) is defined as the estimated amount of assistance for a period of enrollment that a student (or a parent on behalf of a student) will receive from Federal, State, institutional, or other sources, such as scholarships, grants, net earnings from need-based employment, or loans. *Higher Education Act of 1965, as amended, 20 U.S.C. § 1087kk and 34 C.F.R. § 685.102(b)*

Noncompliance: Student #14 received a subsidized student loan in the amount of \$578, which exceeded his need. The student's COA was \$24,171, EFC was \$24,118, and EFA was \$2,000 from an outside scholarship. With the receipt of the outside scholarship, this student had no need for a subsidized loan.

Required Action: LCI must recharacterize this subsidized loan as an unsubsidized loan, for which the student was eligible. In addition, LCI must notify the student of this recharacterization and submit to this office documentation demonstrating that these actions have been taken.

D. Appendix

Appendix A (Student Sample) contains personally identifiable information; therefore, the appendix was provided to institutional officials while on site.



LOUISIANA CULINARY INSTITUTE

September 10, 2012

Mr. Bruce Anderson
Institutional Review Specialist
Federal Student Aid, Dallas School Participation Division
1999 Bryan Street, Suite 1410
Dallas, TX 75201

Re: Program Review Report Response
OPE ID: 04112300
PRCN: 201230627945

Dear Mr. Anderson:

As per the letter from Mr. Jesus Moya, Compliance Manager, of your office, dated August 8, 2012, regarding the Program Review conducted from June 11, 2012 through June 14, 2012 of the Louisiana Culinary Institute (LCI), please find attached LCI's response to the four (4) findings of noncompliance. In addition to the written narrative provided, LCI has also included the required supporting documentation for each finding, some of which includes personally identifiable information (PII). All of the PII is encrypted and password protected. The password to such PII information will be sent under a separate correspondence.

Should you require any further information, please do not hesitate to contact me directly.

Very truly yours,

A handwritten signature in black ink, appearing to read "April R. Ruffolo".

April R. Ruffolo, J.D., LL.M.
Compliance Officer

Enclosures



LOUISIANA CULINARY INSTITUTE

Response to Program Review Report

Louisiana Culinary Institute

OPE ID: 04112300

PRCN: 201230627945

10550 AIRLINE HIGHWAY, BATON ROUGE, LA 70816
PHONE: (225) 769-8820 FAX: (225) 769-8792
WWW.LOUISIANACULINARY.COM WWW.LCI.EDU

A review conducted from June 11, 2012 through June 14, 2012 by Institutional Review Specialists with the Dallas School Participation Division of the United States Department of Education (Department) yielded the below indicated findings relating to Louisiana Culinary Institute's (LCI's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. Under the finding headings are LCI's responses, including a brief, written narrative for each finding clearly stating LCI's position regarding the finding, as well as the corrective action taken to resolve the finding.

Finding 1. Campus Security Procedures Inadequate

Position Regarding the Finding:

LCI concurs with the Department's finding that its Annual Security Report did not include all the required elements, specifically the required crime categories and information on sexual assault information were missing.

Corrective Action Taken to Resolve the Finding:

Crime Categories: LCI immediately revised its Annual Security Report to include all the required crime categories. Specifically, it included the data elements, as listed, on the Department's Office of Postsecondary Education Campus Safety and Security Data Analysis Cutting Tool. This included data for the most recent three (3) calendar years (2009, 2010 and 2011) for on campus and public property required offenses and hate crimes, as well as on campus and public property arrests and disciplinary actions.

Sexual Assault Information: Additionally, LCI immediately revised its Annual Security Report to include the required sexual assault information. This policy includes sections detailing sexual harassment and sexual assault; education and awareness programs; procedures to follow if a sexual assault occurs; LCI disciplinary actions for sexual assault cases; and academic status changes for victims and alleged perpetrators of sexual assaults.

Distribution to Current Students and Employees: LCI elected to distribute its Annual Security Report to its current students and employees via the web. In doing so, LCI sent an email notice to every current student and employee, via their LCI email account, that included (a) a statement of the report's availability; (b) a list and brief description of the information contained in the report; (c) the exact electronic address of the Internet site at which the report is located (<https://www.lci.edu/uploads/2011AnnualSecurityReport.pdf>); and (d) a statement saying that LCI will provide a paper copy of the Annual Security Report upon request.

Supporting Documentation Attached:

1.a. 2011 Annual Security Report

- 1.b. Sexual Harassment and Assault Response and Prevention Policy
- 1.c. Distribution Proof to Current Students and Employees

Finding 2: Use of Current Year Aid to Pay Prior Year Charges

Position Regarding the Finding:

LCI concurs with the Department's finding that it used current student aid awards to pay prior year charges in excess of \$200.00 for students from the 2011 – 2012 award year.

Corrective Action Taken to Resolve the Finding:

After discussion between appropriate departments within LCI, on June 20, 2012, an additional section was added to the LCI Financial Aid Office Policies and Procedures Manual regarding the use of current student aid to pay current award year charges. This policy specifically details the following:

- (a) The Financial Aid Administrator/Tuition Officer's (FAA/TO's) responsibility, at the end of each semester, to notify the Bursar of students entering a different award year in the next upcoming semester;
- (b) The Bursar's responsibility, collaborating with the FAA/TO and/or the Chief Financial Officer, to determine which, if any, of the indicated students have balances totaling more than \$200.00;
- (c) The Bursar's responsibility to document that these students' accounts have prior award year balances totaling more than \$200.00 in LCI's accounting system;
- (d) After charging all student accounts with the appropriate semester charges and upon receipt of the current year financial aid awards, the Bursar's responsibility to determine if the current year financial aid awards exceed the current award year's charges;
- (e) After determining that the current financial aid awards exceed the current award year's charges, the Bursar's responsibility to issue two (2) checks to the student, the first totaling the current credit balance and the second totaling the previous award year's balance minus \$200.00;
- (f) The responsibility of the FAA/TO to explain the federal regulation to the student, why two (2) checks are being issued, and to give the student the option to sign over the second check, giving the student a zero balance; and
- (g) Should the student opt to keep both checks, the responsibility of the FAA/TO, in accordance with the signed Enrollment Agreement, to have the student complete a promissory note for the remaining balance on his or her account.

Supporting Documentation Attached:

- 2.a. Policy on Current Student Aid to Pay Current Year Charges, excerpted from the LCI Financial Aid Office Policy and Procedures Manual

Finding 3: Credit Balance Deficiencies

Position Regarding the Finding:

LCI concurs with the Department's finding that LCI failed to timely pay a credit balance for student #13; however, LCI disagrees with the same finding as related to Student #25. LCI believes the citation for noncompliance relating to Student #25 was an oversight, as the files are paper cumbersome and Student #25 has a Credit Balance Authorization Waiver, executed on May 16, 2012.

Corrective Action Taken to Resolve the Finding:

Student #25 Credit Balance Authorization: Upon review of Student #25's financial file, a Credit Balance Authorization Waiver form, dated May 16, 2012, was found. In paper cumbersome folders, this is an easy oversight. Therefore, since Student #25 has the appropriate credit balance waiver, there would be no need to refund the student the credit balance within fourteen (14) days of its creation.

Procedure on Credit Balance Payments:

After discussion between appropriate departments within LCI, on July 2, 2012, an additional section was added to the LCI Financial Aid Office Policies and Procedures Manual regarding Credit Balances. This policy specifically details the following:

- (a) The Financial Aid Administrator/Tuition Officer's (FAA/TO's) responsibility to educate enrolled incoming students on what a credit balance is and the student's choice to either hold over a credit balance or receive that credit balance refund within fourteen (14) calendar days of its occurrence;
- (b) The FAA/TO's responsibility to explain to the enrolled incoming student that the decision made on the Credit Balance Authorization Waiver form is fully rescindable, at any time, in writing;
- (c) The responsibility of the enrolled incoming student to complete the Credit Balance Authorization Waiver form, indicating whether the student would like the credit balance to be held over or refunded within fourteen (14) calendar days of its occurrence;
- (d) Once becoming part of the student's permanent financial record, the responsibility of the Bursar to document the student's decision to receive a credit balance refund within fourteen (14) calendar days within LCI's accounting system;
- (e) The responsibility of the Bursar to, when distributing and recording federal student aid funds, to analyze all student accounts to determine if a credit balance exists;
- (f) The responsibility of the Bursar, upon determining that a credit balance exists, to determine if the student documented that he or she wants to hold over or receive a refund of said credit balance; and

- (g) The responsibility of the Bursar to issue a credit balance refund within fourteen (14) calendar days for those students requesting that credit balances be refunded and not held over.

Supporting Documentation Attached:

- 3.a. Credit Balance Authorization Waiver for Student #25, Executed on May 16, 2012 (PII)
- 3.b. Policy on Credit Balance Payments, excerpted from the LCI Financial Aid Office Policy and Procedures Manual

Finding 4: Improper Loan Certification

Position Regarding the Finding:

LCI concurs with the Department's finding that it improperly certified, and subsequently over awarded, a subsidized student loan in the amount of \$578.00 for Student #14. This improper certification, and subsequent award, exceeded Student #14's financial need in respect to subsidized loan amounts.

Corrective Action Taken to Resolve the Finding:

Upon indication of noncompliance, LCI, through its third-party servicer, recharacterized the subsidized loan, as an unsubsidized loan, for Student #14. Additionally, in a letter dated June 18, 2012, LCI notified Student #14 of the recharacterization of the loan. A subsequent printout from the Department's Common Origination & Disbursement system was obtained, evidencing \$0.00 in subsidized direct loan awards for Student #14.

Supporting Documentation Attached:

- 4.a. Letter, dated June 18, 2012, to Student #14 (PII)
- 4.b. Common Origination & Disbursement Printout for Student #14 (PII)

Checklist - FPRD Review

(b)(7)(E)

UNITED STATES POSTAL SERVICE



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B. Anderson (FPRD) 04112300
Louisiana Culinary Institute - LA
Dallas School Participation Division
1999 Bryan Street, Suite 1410
Dallas, TX 75201-6881

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OCT 22 2012
BY: _____

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- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

Mr. Earl K. Rush
President/CEO/CFO
Louisiana Culinary Institute
10550 Airline Highway
Baton Rouge, LA 70816-4109

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]* ☒ Agent ☐ Addressee

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2. 7011 2000 0000 8054 3106